



Winston H. Hickox  
Secretary for  
Environmental  
Protection

## Air Resources Board

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Alan C. Lloyd, Ph.D.  
Chairman

2020 L Street • P.O. Box 2815 • Sacramento, California 95812 • [www.arb.ca.gov](http://www.arb.ca.gov)



Gray Davis  
Governor

March 10, 1999

Mr. Robert Perciasepe, Assistant Administrator  
Office of Air and Radiation  
United States Environmental Protection Agency  
401 M Street  
Washington, DC 20460

Dear Mr. Perciasepe:

Over the last several years, California state and local air pollution control agencies, environmental groups, and industry representatives have been working closely with the United States Environmental Protection Agency (U.S. EPA) to seek ways to integrate the federal air toxics program with California's air pollution control program. We appreciate the effort that the U.S. EPA has put forth in addressing this issue and are pleased to have the opportunity to comment on the proposed amendments to 40 Code of Federal Regulations (CFR), Part 63, Subpart E (Subpart E Amendments).


We believe that it is important to the future environmental and economic well-being of California to ensure that we find an acceptable resolution to this issue. The criteria for resolution must include the elimination of duplicate regulatory requirements, the efficient and effective use of limited resources, the retention of the environmental benefits of both the federal and California programs, and the ability for California to simply establish a more comprehensive and stringent criteria and toxic air pollution control program.

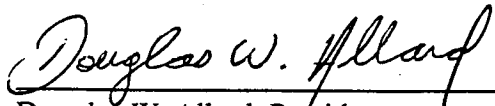
The proposed Subpart E amendments are an integral part of the policy and regulatory changes that must be implemented to successfully resolve this issue. As such, the signatories to this letter ask that you carefully consider the comments that you will be receiving from California regulatory, environmental, and industry representatives, and weigh the development of your final proposal against the criteria presented above. We are committed to continuing to work with the U.S. EPA and are optimistic that we can collectively resolve this issue.


Mr. Robert Perciasepe, Assistant Administrator  
March 10, 1999  
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Thank you for your consideration. If you have any questions, please contact Mike Kenny at (916) 445-4383.

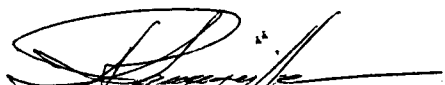
Sincerely,

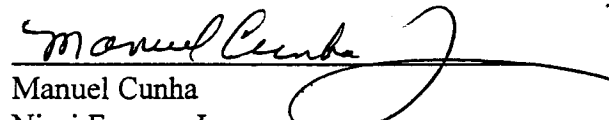
  
Michael P. Kenny  
Executive Officer

  
Douglas W. Allard, President  
California Air Pollution Control Officers  
Association

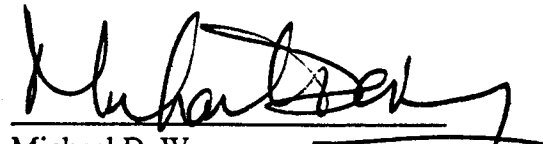
  
Mark Boese, Deputy APCO  
San Joaquin Valley Unified APCD

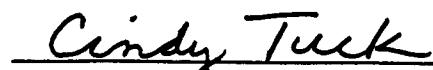
  
Barry R. Wallerstein, D.Env., Executive Officer  
South Coast Air Quality Management District

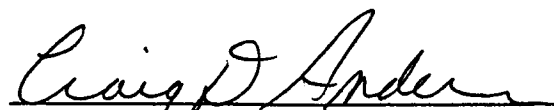
  
R.J. Sommerville, Director  
San Diego County Air Pollution  
Control District

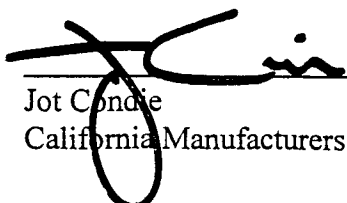
  
Manuel Cunha  
Nisei Farmers League

  
Mike Carroll  
Regulatory Flexibility Group

  
Michael D. Wang  
Western States Petroleum Association

  
Cindy Tuck  
California Council for Environmental and  
Economic Balance

  
Craig Anderson, Chairman  
Air Committee  
Industrial Environmental Association of  
San Diego

  
Jot Condie  
California Manufacturers Association

Mr. Robert Perciasepe, Assistant Administrator

March 10, 1999

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cc: Air and Radiation Docket and Information Center (6102)  
Attention Docket Number A-97-29  
Room M-1500  
United States Environmental Protection Agency  
401 M Street, S.W.  
Washington, DC 20460

Ms. Felicia Marcus, Administrator  
United States Environmental Protection Agency  
Region 9  
75 Hawthorne Street  
San Francisco, California 94105

Mr. Tom Driscoll  
Integrated Implementation Group  
Information Transfer and Program Integration Division (MD-12)  
United States Environmental Protection Agency  
Research Triangle Park, North Carolina 27711